

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

IN RE

AIR CARGO SHIPPING SERVICES  
ANTITRUST LITIGATION

MDL No. 1775

06-MD-1775 (JG) (VVP)

THIS DOCUMENT RELATES TO:  
All Actions

**PLAINTIFFS' NOTICE OF MOTION AND MOTION  
FOR CLASS CERTIFICATION AND APPOINTMENT OF CLASS COUNSEL**

PLEASE TAKE NOTICE THAT, upon the Memorandum of Law in Support of Plaintiffs' Motion for Class Certification and Appointment of Class Counsel, Declaration of Brent W. Landau, Declaration of Dr. Robert Tollison, Declaration of James T. McClave, Ph.D., and Declaration of David Brooks, along with their supporting exhibits, and all other papers and proceedings herein, Plaintiffs will move this Court on a date, time and place to be set by the Court, pursuant to Rule 23 of the Federal Rules of Civil Procedure to enter an order:

1. Certifying a Class defined as:

All persons or entities (but excluding Defendants, their parents, predecessors, successors, subsidiaries, affiliates, as well as government entities) who purchased airfreight shipping services for shipments to or from the United States directly from any of the Defendants or from any of their parents, predecessors, successors, subsidiaries, or affiliates, at any time during the period January 1, 2000 up to and including September 30, 2006;

2. Appointing Michael D. Hausfeld of Hausfeld LLP, Hollis Salzman of Labaton Sucharow LLP, Robert N. Kaplan of Kaplan Fox & Kilsheimer LLP, and Howard J. Sedran of Levin, Fishbein, Sedran & Berman as Class Counsel; and

3. Directing such other relief that the Court deems appropriate.

Oral argument on this motion will be held on a date and time set by the Court.

Dated: October 28, 2011

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